

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 22 C 3639
)	
CHICAGO BASEBALL HOLDINGS, LLC;)	Judge Pacold
WRIGLEY FIELD HOLDINGS, LLC; WF)	
MASTER TENANT, LLC; and CHICAGO)	Magistrate Judge McShain
CUBS BASEBALL CLUB, LLC,)	
)	
Defendants.)	

JOINT STATUS REPORT

The parties, by their undersigned attorneys, submit this joint status report in accordance with the court's minute entries of July 24 and August 29, 2023 (Dkt. 28, 32):

(a) Progress of fact discovery: Since the parties filed their joint agreed motion to extend fact discovery three weeks ago at the end of August (Dkt. 31), which the court granted (Dkt. 32), the United States has issued two additional document subpoenas to the City of Chicago, one to the Department of Buildings and the other to the Mayor's Office for People with Disabilities. The defendants have also issued a document subpoena to the City; have completed the bulk of their document productions; and are working to supplement their written discovery responses and to provide a privilege log. Additionally, the parties completed the inspection of Wrigley Field on September 11 and 12. The United States anticipates that it will be in a position to issue at least an initial round of deposition notices to the defendants and deposition subpoenas to third parties within the next three to four weeks. The current deadline to complete fact discovery is December 22, 2023. Dkt. 32.

(b) Status of settlement discussions: The parties are not currently engaged in settlement discussions and do not request a settlement conference at this time. The parties will notify the court in the future if a settlement conference would be productive.

(c) Other matters: The parties do not have additional items to raise with the court at this time.

Respectfully submitted,

For the United States:

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Acting United States Attorney

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